

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK**

KATHRYN SHIBER.

Plaintiff,

-against-

CENTERVIEW PARTNERS, LLC

Defendant.

Civil Action No. 1:21-cv-03649-ER

ECF Case

DECLARATION OF HOPE D. SKIBITSKY

I, Hope Skibitsky, hereby declare under penalty of perjury that:

1. I am a partner with Quinn Emanuel Urquhart & Sullivan, LLP, and counsel for Centerview Partners, LLC (“Centerview”). I am an attorney in good standing with the New York State Bar and am admitted to practice before the U.S. District Court for the Southern District of New York. I submit this declaration and its accompanying exhibits in support of Centerview’s Renewed Motion for Summary Judgment.

2. Attached hereto as Exhibit 1 and with redactions applied is a true and correct copy of an August 28, 2020 email exchange between Timothy Ernst and Kathryn Shiber.

3. Attached hereto as Exhibit 2 and with redactions applied is a true and correct copy of a September 16, 2019 email calendar invitation from [REDACTED] to Tony Kim.

4. Attached hereto as Exhibit 3 and with redactions applied is a true and correct copy of a September 2, 2020 email exchange between Timothy Ernst, Tony Kim, and [REDACTED].

5. Attached hereto as Exhibit 4 and with redactions applied is a true and correct copy of an August 25-26, 2020 email exchange between Kathryn Shiber and Timothy Ernst.

6. Attached hereto as Exhibit 5 and with redactions applied is a true and correct copy of a document produced by Plaintiff in this matter consisting of a September 1, 2020 Letter of Medical Necessity.

7. Attached hereto as Exhibit 6 and filed under seal is a true and correct copy of a document produced by third-party Dartmouth College consisting of an October 30, 2018 evaluation note by Dr. Da-Shih Hu.

8. Attached hereto as Exhibit 7 is a true and correct copy of the August 23, 2021 Second Amended Complaint in this action (Dkt. 23).

9. Attached hereto as Exhibit 8 is a true and correct copy of the May 10, 2022 Answer to Second Amended Complaint in this action (Dkt. 36).

10. Attached hereto as Exhibit 9 is a true and correct copy of excerpts from the transcript of Timothy Ernst's deposition taken in this matter on March 21, 2023.

11. Attached hereto as Exhibit 10 and with redactions applied is a true and correct copy of excerpts from the transcript of Tony Kim's deposition taken in this matter on February 3, 2023.

12. Attached hereto as Exhibit 11 is a true and correct copy of a document produced by Centerview in this matter comprised of a compilation of reviews for Centerview published on Vault.com.

13. Attached hereto as Exhibit 12 and with redactions applied is a true and correct copy of an August 24, 2020 email exchange between [REDACTED], Timothy Ernst, and [REDACTED]
[REDACTED]

14. Attached hereto as Exhibit 13 and with redactions applied is a true and correct copy of an August 28, 2020 email from Cheryl Robinson to Jeanne Vicari.

15. Attached hereto as Exhibit 14 and with redactions applied is a true and correct copy of an August 31, 2020 email exchange between Cheryl Robinson and Tony Kim, and a September 1, 2020 email from Jeanne Vicari to Cheryl Robinson.

16. Attached hereto as Exhibit 15 and with redactions applied is a true and correct copy of a September 2-6, 2020 email exchange between Tony Kim and Timothy Ernst.

17. Attached hereto as Exhibit 16 and with redactions applied is a true and correct copy of a September 8, 2020 email exchange between [REDACTED] and Timothy Ernst.

18. Attached hereto as Exhibit 17 is a true and correct copy of a September 1, 2020 email from Kathryn Shiber to Cheryl Robinson.

19. Attached hereto as Exhibit 18 is a true and correct copy of excerpts from the transcript of Cheryl Robinson's deposition taken in this matter on February 7, 2023 .

20. Attached hereto as Exhibit 19 is a true and correct copy of excerpts from the transcript of Kathryn Shiber's deposition taken in this matter on January 25, 2023.

21. Attached hereto as Exhibit 20 is a true and correct copy of a document produced by Plaintiff in this matter consisting of a September 15, 2020 email from Kathryn Shiber to William Susman and attaching a Word document and a PDF document.

22. Attached hereto as Exhibit 21 is a true and correct copy of excerpts from the transcript of Marylee Verdi's deposition taken in this matter on February 14, 2023.

23. Attached hereto as Exhibit 22 is a true and correct copy of excerpts from the transcript of Jeanne Vicari's deposition taken in this matter on February 24, 2023.

24. Attached hereto as Exhibit 23 and with redactions applied is a true and correct copy of an August 28, 2020 email exchange between Kathryn Shiber and Cheryl Robinson.

I declare under penalty of perjury that the foregoing is true and correct. Executed in New York, New York on September 9, 2024.



Hope D. Skibitsky